

February 4, 2019

Hon. P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Valassis Communications, Inc. v. News Corp. et al.*, No. 17-cv-07378 (PKC)

Dear Judge Castel:

We write jointly on behalf of the parties in the above-referenced case.

The parties wish to express their appreciation to the Court for the care with which it has approached the pending motion for summary judgment, the time devoted to the argument last Thursday, and the time spent with the parties after the argument. The parties recognize the potential benefits of a negotiated resolution to this matter, and have engaged in good-faith settlement negotiations involving their respective general counsels. The collective view of the parties' inside and outside counsel, in light of those negotiations, is that the additional structure of a formal third-party mediation would not be productive at this time. We will keep the Court apprised of any changes in this regard.

Respectfully submitted,

/s/ Michael S. Shuster

Michael S. Shuster
Counsel to plaintiff

/s/ Kenneth A. Gallo

Kenneth A. Gallo
Counsel to defendants